

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

UNITED STATES OF AMERICA,

v.

Criminal No. 2:17-cr-00198-004

RALPH WHITE,
Defendant.

MOTION FOR IMMEDIATE COMPASSIONATE RELEASE

Now comes Defendant, Ralph White, by and through his counsel, John H. Tinney, Jr., and the law firm of Hendrickson & Long, PLLC, and pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) respectfully requests that this Court enter an Order granting Mr. White immediate release from his incarceration at FCI Elkton and allowing him to serve the remainder of his sentence on home confinement. In support of his motion, Defendant adopts and incorporates by reference the Memorandum of Law in Support of Motion for Immediate Compassionate Release filed contemporaneously herewith. Due to the potential for imminent harm created by the current situation at FCI Elkton, Defendant requests that the Court enter an expedited schedule to address the motion.

WHEREFORE, Defendant Ralph White requests the Court enter an Order granting his Motion for Immediate Compassionate Release from incarceration.

Respectfully submitted,

RALPH WHITE

/s/ John H. Tinney, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May, 2020, I electronically filed this “**Motion for Immediate Compassionate Release**” with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following as follows:

John J. Frail, AUSA
United States District Court for the
Southern District of West Virginia
P.O. Box 1713
Charleston, WV 25301

/s/ John H. Tinney, Jr.
John H. Tinney, Jr. (W.Va. Bar # 6970)